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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LAS VEGAS DRAGON HOTEL, LLC, a  
limited-liability company, dba ALPINE  
MOTEL; ADOLFO G. OROZCO, an individual;  
ERIKA AYALA (aka ERIKA AYALA-  
AGUILAR), an individual; ELITE 1, LLC,  
domestic limited-liability company; GALEANA,  
LLC, a Delaware limited-liability company,  
CANCUN, LLC, a domestic limited liability  
company,

Plaintiffs,

v.

ALLIED WORLD INSURANCE COMPANY;  
and DOES I to XV, insurance brokers, agents  
and claims supervisors and insurers for the  
general liabilities of the above-named plaintiffs,

Defendants.

Case No: 2:23-cv-00687-APG-VCF

**STIPULATION TO EXTEND DEADLINES  
TO CONFER PURSUANT TO FED. R. CIV.  
P. 26(f) AND TO FILE DISCOVERY PLAN**

Defendant Allied World Insurance Company (“Allied World”) and Plaintiffs Las Vegas Dragon Hotel, LLC dba Alpine Motel, Adolfo G. Orozco, Erika Ayala (aka Erika Ayala-Aguilar), Elite 1, LLC, Galeana LLC, and Cancun, LLC (“Plaintiffs”) hereby stipulate and agree to: (1) extend the deadline for the parties to confer pursuant to Federal Rule of Civil Procedure 26(f) by 30 days, from July 10, 2023 to August 9, 2023; and (2) extend the deadline for the parties to file a discovery plan by 30 days, from July 23, 2023 to August 22, 2023.

This is the parties’ first request for extension of the foregoing deadlines. This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the requested extensions, as Plaintiffs’ response to Allied World’s counterclaim is now due on July 28, 2023 (*see* ECF No. 19); there is a change in counsel pending for Plaintiffs in this matter; and new counsel for Plaintiffs will

1 need time to familiarize himself with this matter in order to meaningfully engage in the issues for  
2 discussion under Rule 26(f) and LR 26-1.

3 **WILSON ELSEER MOSKOWITZ**  
4 **EDELMAN & DICKER LLP**

5 DATED this 10th day of July, 2023.

6 /s/ **Chad C. Butterfield**

7 Chad C. Butterfield, Esq.  
8 Nevada Bar No. 10532  
9 6689 Las Vegas Blvd. South, Suite 200  
10 Las Vegas, Nevada 89119  
11 *Attorneys for Defendant Allied World Insurance*  
12 *Company*

13 **BOYACK ORME & ANTHONY**

14 DATED this 10th of July, 2023.

15 /s/ **Christopher B. Anthony**

16 Edward Dean Boyack  
17 Nevada Bar No. 5229  
18 Christopher B. Anthony  
19 Nevada Bar No. 9748  
20 7432 W. Sahara Avenue, Suite 101  
21 Las Vegas, NV 89117  
22 *Attorneys for Plaintiffs*

23 **ORDER**

24 **IT IS SO ORDERED**

25 

26 UNITED STATES MAGISTRATE JUDGE

27 Dated July 11, 2023.

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on July 10, 2023, I served the foregoing **STIPULATION TO EXTEND DEADLINES TO CONFER PURSUANT TO FED. R. CIV. P. 26(f) AND TO FILE DISCOVERY PLAN** as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

BY: /s/ Angela Rafferty  
An Employee of WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP